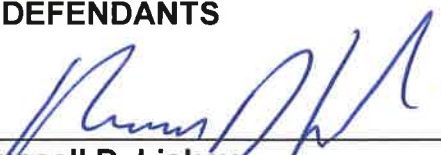


NO.: FBT-CV-15-6048078-S : SUPERIOR COURT  
JONATHAN SHAPIRO : J. D. OF FAIRFIELD  
VS. : AT BRIDGEPORT  
FRANK DELBOUNO, ET AL. : NOVEMBER 2, 2016

**OBJECTION TO MOTION TO  
PRECLUDE EXPERT TESTIMONY**

The Defendants object to the Plaintiff's Motion to Preclude Expert Testimony. The Defendants have sent the Plaintiff on October 31, 2016 each and every document requested. The Plaintiff has over thirty (30) days to depose Dr. Brown and all the Defendants did was to photocopy an identical copy of all records sent by the Plaintiff to the Defendants as part of its standard Requests for Production. Thus, the Plaintiff put the Defendants through the superfluous exercise of making a voluminous copy of medical records that were already in the possession of the Plaintiff. The Defendants have exclusively relied on the Plaintiff to produce all medical records as required under the standard Interrogatories and Requests for Production. The Plaintiff has suffered no prejudice whatsoever as he was already in possession of the requested documents.


**THE DEFENDANTS**

BY:   
**Russell D. Liskov**  
Associate City Attorney  
**OFFICE OF THE CITY ATTORNEY**  
999 Broad Street – 2<sup>nd</sup> Floor  
Bridgeport, CT 06604  
Telephone: 203-576-7647  
Juris No. 06192

### CERTIFICATION

This is to certify that a copy of the foregoing was sent via first-class mail, postage prepaid, on this 2<sup>nd</sup> day of October, 2016, to all counsel and pro se parties of record as follows:

Kevin C. Shea, Esq.  
Clendenen & Shea, LLC  
400 Orange Street  
New Haven, CT 06511



Russell D. Liskov